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June 3, 2025

**BY E-FILING**

The Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

**APPLICATION GRANTED  
SO ORDERED**

Re: *Yipit, LLC v. Emmett et al.*  
Case No. 24 Civ. 07854 (JGK)

*John G. Koeltl, U.S.D.J.*

Dear Judge Koeltl:

*6/3/25*

We represent Defendant Alexander Pinsky in the above-referenced matter. We write to request an extension of Mr. Pinsky's time to assert a motion to dismiss with respect to Plaintiff's Second Amended Complaint, which is currently due on Friday, June 6, 2025. (Dkt. No. 226).

Earlier today we filed a motion on Mr. Pinsky's behalf, seeking entry of a revised stipulated consent judgment executed both by counsel for Mr. Pinsky and by counsel for Plaintiff. (Dkt Nos. 240-242). We believe that the revised consent judgment fully addresses all of the objections to the earlier proposed judgment as expressed by the Court on two separate occasions, as well as the objections previously asserted by Defendant M Science. Accordingly, we expect that this litigation will end as between Plaintiff and Mr. Pinsky.

As a result, we do not believe it a reasonable expenditure of Mr. Pinsky's resources to file his motion to dismiss directed at Plaintiff's Second Amended Complaint, which is due on Friday, June 6, 2025. We therefore request an extension of time to file such a motion to dismiss until one week after the pending motion to approve the revised consent judgment is decided (which, as noted above, we believe will render a motion to dismiss moot).

We thank the Court for its consideration.

Respectfully submitted,  
RASCO KLOCK LLC

By:   
Blaine Bortnick

cc: Counsel of Record (by ECF)